



THE METROPOLITAN WASHINGTON EAR, INC.

A radio reading service for the blind and physically handicapped

A NON-PROFIT CORPORATION

Margaret Rockwell Pfanstiehl, Ed.D.
President

February 26, 2002

Re: MM Docket 99-339
Implementation of Video Description
of Video Programming

William Caton, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Dear Mr. Secretary,

On behalf of millions of blind, visually impaired and aging Americans who have already been waiting much too long for access to commercial television, I fervently urge the Federal Communications Commission to deny the request for a stay of the video description rule MM 99-339.

Ever since July 2000 when the video description rule was announced, the blind, visually impaired and aging community has been excitedly looking forward to its implementation in April of 2002.

Now commercial for-profit broadcast and motion picture industries are requesting an extension of the usual 18 month waiting period. They were granted an additional three months. At the eleventh hour they now wish to delay the implementation of the rule for many more months until the court has reached a decision concerning their challenge of the rule.

I leave it to others to refute the financial assertions of the NAB, NCTA and MPAA, but I do know for a fact that WGBH, Narrative Television Network in Oklahoma and the National Captioning Institute in Virginia, are already busily

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applying descriptions to upcoming television programs in compliance with the April 1, 2002 deadline.

As a visually impaired person I was outraged to read that in the opinion of the opposition to deny mandated access to blind and visually impaired people to certain television programs would contribute to the public good. Opponents to access to television also discuss the "rights" of Spanish speaking people to Spanish translations on the SAP channel of their TV sets which would be diminished if they were temporarily forced to share SAP channel time to provide some described programming. What about the rights of native born citizens who are either blind or visually impaired? We cannot learn to see although Spanish speaking people can learn English which is still the dominant language in this country. Once digital TV is prevalent there will be no necessity to share time on the SAP channel.

References to a voluntary approach to described programs on commercial television are ludicrous. For the past twelve years voluntary described programs on commercial TV outlets have been all but nonexistent. We have absolutely no reason to believe that this will change. In considering the public good, blind, visually impaired and aging people should be INcluded, not excluded. The government has seen fit to insure that the needs of the deaf and hard of hearing are met by mandating closed captioning. We applaud this decision but we also strongly feel that the needs of approximately 12 million blind and visually impaired people and countless others who are aging must also be upheld.

Sincerely yours,

Margaret R. Pfanstiehl ED.D.
Founder and President
Metropolitan Washington Ear

Co-chair,
National Television
Video Access Coalition

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